

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND**

**UNITED STATES**

**V.**

**18MJ154PAS**

**CHRISTOPHER KINNEY**

**MOTION TO MODIFY CONDITIONS OF RELEASE**

Now comes Christopher Kinney, through counsel, and requests the Honorable Court to modify the conditions of his release as follows:

1. Reduce the restriction to his residence to 7:00 pm through 5:00 am.
2. Extend the area of travel to include the State of Connecticut.

In support thereof, Kinney states that he has an employment offer from R J Carbone Co Flower Distributors, 1 Goddard Street, Cranston, RI, 800-343-2242 x 3125, as a delivery person. His start date would be May 4, 2018. His responsibilities would include arriving at work at 6:00 am to load delivery trucks with merchandise. Thereafter, he would deliver the merchandise to various flower shops in Rhode Island, Massachusetts, and Connecticut.

Wherefore, Mr. Kinney prays that the Honorable Court modify the conditions of his release to accommodate his prospective employment.

Christopher Kinney  
By his attorney,

s/Mary June Ciresi  
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**CERTIFICATION**

I hereby certify that this document filed through the ECF system on the 3rd day of May 2018 will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

s/Mary June Ciresi